

# EXHIBIT C

**From:** Willie Dennis <woc2020@gmail.com>  
**Sent:** Wednesday, June 22, 2022 2:41 PM  
**To:** [REDACTED]; Kushner, Sarah (USANYS)  
**Cc:** Willie Dennis  
**Subject:** [EXTERNAL] U.S. v. Dennis, 20 Cr. 623 (LGS)-Failure of Federal Defenders' To Request Exculpatory Evidence ( Brady Request )-Request For Dismissal of All Charges  
**Attachments:** Trial Request.docx; Re U.S. v. Dennis, 20 Cr. 623 (LGS)-Federal Defenders' Refusal to Provide Copies of Files and Discovery..docx; Dear Mr Patton.pdf; Item 8 Brady and Giglion Material.pdf

Via Overnight Mail-UPS

The Honorable Lorna G. Schofield  
United States District Judge  
United States District Court  
Southern District of New York  
[40 Foley Square](#)  
New York, NY 10007

**Re U.S. v. Dennis, 20 Cr. 623 (LGS)-Failure of Federal Defenders' To Request Exculpatory Evidence ( Brady Request )-Request For Dismissal of All Charges**

Dear Judge Schofield,

I was dismayed to learn this past Friday, June 17, 2022, that the Federal Defenders of New York ( the " Federal Defenders " ) "never " submitted a Brady request or any other discovery request to the Depsrtment of Justice, even though they have been counsel of record since **November 18, 2021**.

As a result of, among other things, the ( i ) negligence by the Federal Defenders to promptly request exculpatory material from the Department of Justice ( ii ) bad acts of the Department of Justice in connection with this matter as described below and (iii) bad acts of Proskauer Rose in connection with this matter and **Willie Dennis v. K&L Gates LLP, et al., No. 1:20-cv-09393-MKV**, I am respectfully requesting that the Court dismiss all charges against me in **U.S. v. Dennis, 20 Cr. 623 (LGS)**

The facts are as follows:

**A The Federal Defenders**

**1.** After months of requesting that a Brady discovery request be sent to the Department of Justice, Mr Neil Kelly of the Federal Defenders informed me on April 22, 2022, that he was sending out a Brady discovery request soon to the Department of Justice. (See April 22, 2022 communication attached below )

In fact the no Brady requests were ever delivered to the Department of Justice

**2** Since **May 31, 2022** the Federal Defenders have had several opportunities to advise me, and the Court, that no discovery questions had been submitted to the Department of Justice. The Federal Defendants did so only after my

letter to the Court on June 17,, 2022 (attached below )requesting the Court to "order " the Federal Defenders to provide exculpatory discovery in my preparation for trial.

**3** The Federal Defenders refusal to immediately turn over all files caused further delay in my preparation for trial. Case law is well settled in this area. A client is entitled at any time to review and copy material from his file (**Sage Realty Corp. v. Proskauer Rose, 91 N.Y.2d 30, 666 N.Y.S.2d 985 (1997)**) Since this is a criminal case and I am representing himself ,there is an urgency for the Federal Defenders to comply.

**4** For other material problems in the representation provided by the Federal Defenders, please see attached below the termination of representation letter delivered to the Federal Defenders on May 31, 2022 ( the " Termination Letter" )

**B The Department of Justice**

**1** Since the termination of the Federal Defenders representation on May 31, 2022 the Department of Justice has been copied on, or forwarded, all e-mails to the Federal Defenders and Court requesting that the Brady information collected to date be provided to me. At no point did the Department of Justice ever state that no exculpatory information had ever been requested by the Federal Defenders .

Instead the Department of Justice remained silent.

**2** Since **U.S. v. Theodore F. Stevens**, the Department of Justice has always adhered to the principle that providing a criminal defendant with exculpatory information as soon as it is requested is fundamental in maintaining public trust in our criminal justice system. ( See statement by the former United States Attorney General Eric Holder, April 1, 2009 <https://www.npr.org/2009/04/01/102589818/justice-dept-seeks-to-void-stevens-conviction> )

**3** As I continue to prepare my defense without any potentially exculpating material, it is clear that the Department of Justice's silence has materially benefitted the Department of Justice and my former partners at KL Gates, who filed the complaint against me. This is very disturbing given the advantages that the Department of Justice already maintains in the case\*\*

### **C Proskauer Rose**

1. On April 15, 2022 at 12:54 pm [REDACTED], a [REDACTED] sent Mr Neil Kelly'sof the Federal Defenders an e-mail ( the " [REDACTED] e-mail")relating to a communication which [REDACTED] had sent three minutes earlier ( 12:51 pm ) to me and the American Arbitration Association ( " AAA") without the knowledge or consent of myself or the AAA \*\*

On the [REDACTED] e-mail, Ms [REDACTED] cc'd her partner, [REDACTED]. [REDACTED] is described on the [REDACTED] website as "... recently serving as Assistant U. S. Attorney for the U. S. Attorney's Office for the Southern District of New York...as Co-Chief of the General Crimes Unit, supervising approximately 50 Assistant US Attorney's..."

Given that [REDACTED] is working on behalf of KL Gates in **Willie Dennis v. KL Gates** " one can only assume that [REDACTED] communications with Mr Kelly without my knowledge or consent was only another attempt by [REDACTED] to help secure my conviction in " **U.S. v. Dennis.**\*\*

**2.** On Monday, June .13, 2022, at 7:23 pm in connection with **Dennis v. K&L Gates** , [REDACTED] violated the Order dated March 24, 2021

( Docket No. 35 ) of the Honorable Mary Kay Vyskocil of the United States District Court of the Southern District of New York by filing a " joint status " without my consent, and intentionally omitting material information which I requested to be included. The information intentionally omitted by [REDACTED] included, among other things, my request that the Federal Defenders provide me with copies of all communications between the Federal Defenders and [REDACTED] relating to **U.S. v. Dennis**, and **Dennis v. K&L Gates**.

The attorneys at [REDACTED] are clearly aware of the holdings by the court in  
**Sage Realty Corp. v. Proskauer Rose, 91 N.Y.2d 30, 666 N.Y.S.2d 985 (1997)**

Given all the facts above and facts previously shared with the Court , I believe and I respectfully hope the Court agrees, at this time I cannot receive a fair trial as guaranteed by the Article II of the Constitution of the United States and the Fourth, Fifth and Sixth Amendments to the Constitution. In view of this,I respectfully request that the Court dismiss all charges as soon as ressoably posdible for the Court\*\*\*.

As I do not currently have your e-mail address, I am sending this to you via overnight mail. I am also copying and sending via e-mail this communication to David Patton and AUSA Sarah Kushner, with the request that Mr Parton and Ms Kushner upon receipt provide you with a copy of this communication and all attachments.

Thank you for taking the time to review and consider my requests

Respectfully submitted,

**Willie E. Dennis, Esq**  
woc2020@gmail.com

[REDACTED]  
**Admitted in New York, New Jersey and the District of Columbia since 1988**

cc AUSA, Department of Justice Sarah Kushner ( via e-mail )  
David Patton, Executive Director and Attorney in Chief, Federal Defenders of New York (via e-mail )

**\* The Federal Defenders of New York**

**April 22, 2022**

As the Court reviews I humbly requests the Court to consider how “ unusual ” it is for the defendant to have to “push” his criminal defense attorneys to send out a request for exculpatory information.... and it still did not go out.

**My hope is that the Department of Justice will take the actions of the Federal Defenders described herein into account in all its decisions relating to U.S. v. Dennis, 20 Cr. 623**

**\*\* The Department of Justice**

The Department of Justice already has received more than a year longer than me to prepare for trial. The “ sealed ” indictment was handed down on **October 28, 2020**, without me ever being interviewed. I first learned of the indictment on **November 18, 2022**

Since the Department of Justice has been aware of the “ additional Brady questions” since May 31, 2022 ’ the only way to begin to correct their errors, would be for the Department of Justice to appear in Court on June 28, 2022 with a material portion of the discovery requested. See the additional questions attached

The Department of Justuce coming to Court on June 28th and asking for more time to produce exculpatory information “because they never asked before “would be at best disenguenious. Based on their experience, the Department of Justice is well aware that not receiving a request for “ exculpatory ” information from defense counsel after 8 months is not considered “ best practices. ”

Similarly requesting the Court to push the trial date further out while the discovery material is collected, would just continue to exacerbate the harm that has already been done to me.

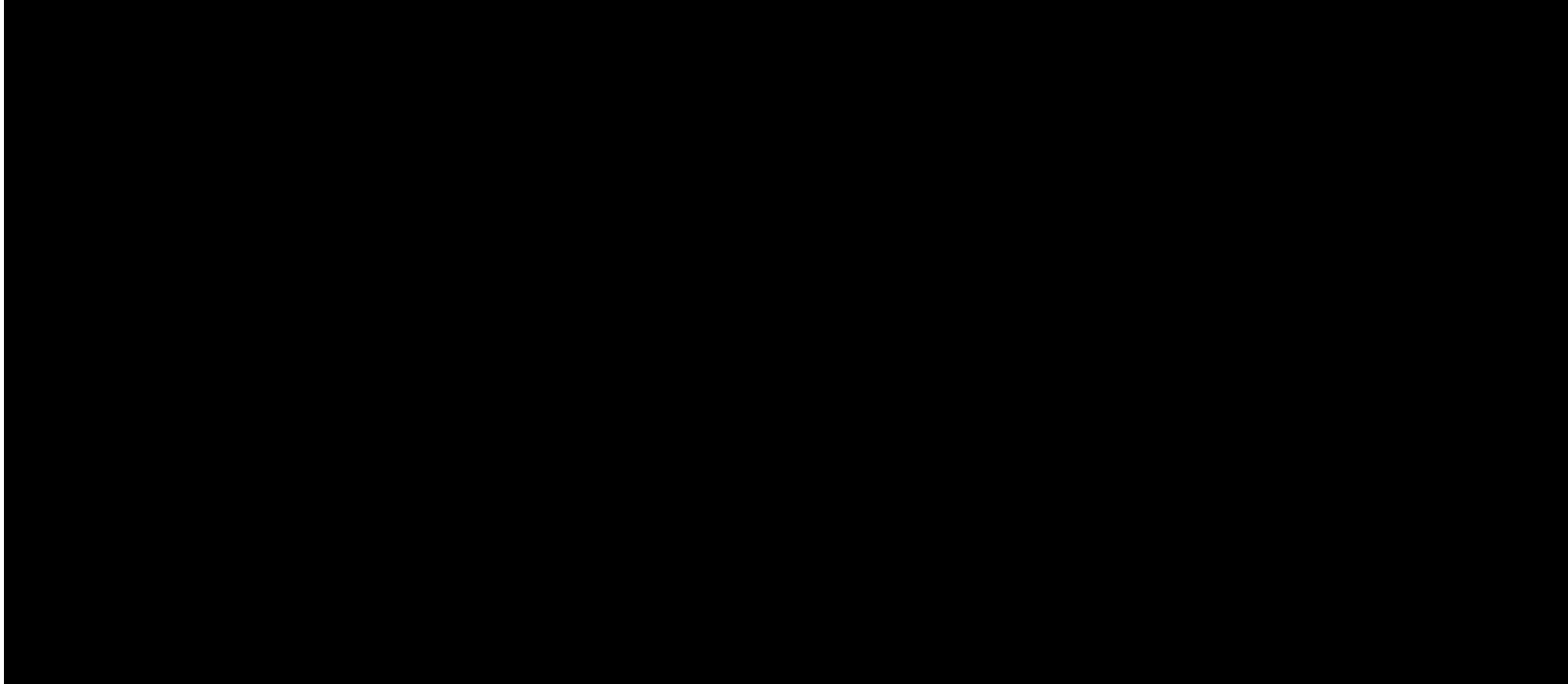
Since January 26, 2022 discovery by the Department of Justice with respect to my mobile devices was completed. Since that date I have repeatedly asked the Department of Justice for the return of my iphone ( [REDACTED] My requests have been rejected

The only email address the Department of Justice has allowed me to use ([woc2020@gmail.com](mailto:woc2020@gmail.com) );remains connected to that iphone . The Department of Justice has refused to allow me to open another e-mail account. Thus anyone with access to my iphone has the potential ability, among other things, to read my e-mails in connection with my preparation of my defense on a real time basis.

Since the inception of U.S. v. Dennis there has been severe interference with my electronic devices ( both iphone and my iPad and iPad) which has materially interfered with my ability to prepare my defense. Extensive documentation of this electronic interference has been collected and submitted on a consistent basis to both the Federal Defenders and Pre-Trial services. I am presently organizing the reports submitted to the Federal Defenders and Pre-Trial services. Once this task is completed, I will present to the Court with additional discovery requests.

I respectfully request the Court to consider whether the United States Attorney for the Southern District, Damian Williams, had sufficient time to review and consider the merits of the sealed indictment dated **October 28, 2020** before moving forward. Mr Williams was appointed on **October 27, 2021**. Less than 30 days later, action was being taken with respect to the October 28, 2020 sealed indictment. Prior to his appointment, Mr Williams served as the Chief of Securities and Commodities Task Force in the Southern District of New York

Moreover It appears, and I respectfully and humbly requests the Court to consider in making its determination, from the January 6th congressional hearings that the Department of Justice was “ **ethically challenged** ” during the period. ( October 28, 2020 ) which was seven days before Election Day., during which the “ sealed indictment ” was obtained.



In his role as my criminal defense attorney, Mr Kelly refused to notify the Southern District or the Court of this ethical violation and refused my request to ask [REDACTED] the following questions with respect to the [REDACTED] e-mail:

1. Please explain why [REDACTED] was copied on the communication sent on April 15, 2022.

2. Have [REDACTED]  
[REDACTED] ?

3. [REDACTED] ?

4. You state in your e-mail that you "believe this should be of interest to " me. Why did you make that statement ?  
[REDACTED]

I intend to file a motion with the Honorable Mary Kay Vyskocil of the United States District Court of the Southern District of New York requesting the court to compel [REDACTED] to respond in writing to these questions.

**My hope is that the Department of Justice will take the actions of [REDACTED] described herein into account when considering the veracity of any claims made by KL Gates and [REDACTED] in U.S. v. Dennis, 20 Cr. 623**

\*\*\* From a public policy. I humbly ask the Court to consider that given all the significant issues facing our Nation now, many currently being investigated by the Department of Justice, (the January 6th defendants (Rudy Giuliani/ Mark Meadows)), mass shootings across the country, lawsuits relating to Roe v. Wade, state legislation redistricting lawsuits, the ethical issues of Clarence Thomas and the Supreme Court, civil rights violations ( Ronald Greene for example ))..... is the Department of Justice's resources ( or the Court's time) being wisely used to prosecute a case against a man who (I) has a history of community service (ii) is an officer of the Court without incident for over 30 years and (iii) with no criminal history..... against claims by senior thick skinned male law partners of the 6th largest law firm in the world that they were harmed by e-mails (" words " ) from a fellow partner ?

May 31, 2022 Termination Letter ( Explanations for Termination )

May 24, 2022 - Addtional Brady Requests